

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM FEDERAL CREDIT
UNION, on behalf of itself and its members,**

Plaintiff,

vs.

Case No. 2:19-cv-00624-RJC

**FISERV SOLUTIONS, LLC, f/k/a FISERV
SOLUTIONS, INC., and FISERV, INC.,**

Defendants.

**DECLARATION OF CHARLES J. NERKO
IN OPPOSITION TO FISERV'S MOTION FOR A PROTECTIVE ORDER**

Charles J. Nerko declares under penalties of perjury:

1. I am a partner at Barclay Damon LLP and counsel to plaintiff Bessemer System Federal Credit Union.
2. **Exhibit A** hereto is a true and correct copy of the parties' Master Agreement.
3. **Exhibit B** hereto is plaintiff's proposed Protective Order.
4. To the best of my knowledge, plaintiff has no in-house counsel.

Dated: January 21, 2022

/s/ Charles J. Nerko
Charles J. Nerko